

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

| | | |
|---------------------------|---|-------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| Plaintiff, |) | |
| v. |) | No. 4:23-CR-505 AGF PLC |
| |) | |
| MARCELLIS BLACKWELL, |) | |
| |) | |
| Defendant. |) | |

**UNITED STATES OF AMERICA’S NOTICE OF INTENT
NOT TO CALL WITNESSES AT SUPPRESSION HEARING**

The United States of America, by and through its Attorneys, Matthew T. Drake, Acting United States Attorney for the Eastern District of Missouri, and Christine H. Krug, Assistant United States Attorney for said District and hereby provides notice that the United States does not intend to call witnesses at the hearing regarding the Defendant’s motion to suppress evidence. While the Defendant has made a *Franks* allegation, he has not met the substantial preliminary showing necessary to be granted a *Franks* hearing. Therefore, “only that information which is found within the four corners of the affidavit may be considered in determining the existence of probable cause.” *United States v. Leichtling*, 684 F.2d 553, 555 (8th Cir. 1982). The United States intends to admit a copy of the three search warrants, applications for the search warrants, and affidavits in support of each search warrant pursuant to Fed.R.Evid. 902(2).

Respectfully submitted,

MATTHEW T. DRAKE
Acting United States Attorney

/s/ Christine H. Krug
CHRISTINE H. KRUG #42586 MO
Assistant United States Attorney
111 South 10th Street, Room 20.333
St. Louis, Missouri 63102
(314) 539-2200

CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2025, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system all counsel of record.

/s/ Christine H. Krug
CHRISTINE H. KRUG, #42586MO
ASSISTANT UNITED STATES ATTORNEY